

**SITE ASSESSMENT REPORT
FOR THE
SMEAD AVENUE DRUM SITE
TOLEDO, LUCAS COUNTY, OHIO**

NPL STATUS: NON-NPL

Prepared for:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Emergency Response Branch
Region V
25089 Center Ridge Road
Westlake, OH 44145

Prepared by:

WESTON SOLUTIONS, INC.
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U.S. EPA On-Scene Coordinator:	Jon Gulch

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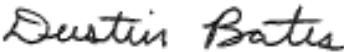
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START Project Scientist

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START Project Manager

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ABBREVIATIONS AND ACRONYMS

CFR	<i>Code of Federal Regulations</i>
EPI	Environmental Purification Industries
ERB	Emergency Response Branch
mg/L	Milligram per liter
mm/sec	Millimeter per second
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
OSC	On-Scene Coordinator
PID	Photoionization detector
PPE	Personal protective equipment
ppm	Part per million
START	Superfund Technical Assessment and Response Team
SU	Standard unit
SVOC	Semivolatile organic compound
TCLP	Toxicity Characteristic Leaching Procedure
TDD	Technical Direction Document
U.S. EPA	United States Environmental Protection Agency
VOC	Volatile organic compound
WESTON	Weston Solutions, Inc.

1. INTRODUCTION

The United States Environmental Protection Agency (U.S. EPA) Region 5 Emergency Response Branch (ERB) tasked the Weston Solutions, Inc. (WESTON®), Superfund Technical Assessment and Response Team (START) to assist with a removal site assessment at the Smead Avenue Drum site in Toledo, Lucas County, Ohio (the Site) (**Figure 1**). Under Technical Direction Document (TDD) No. S05-0001-1205-008, WESTON START was tasked to perform the following activities:

- Create an inventory of abandoned wastes in drums
- Collect samples for laboratory analysis from a selection of drums, including both open and closed drums
- Document and summarize the potential for imminent and substantial threats to the public health or welfare of the United States or the environment

On May 24, 2012, WESTON START personnel mobilized to the Site and conducted site assessment tasks under the direction of On-Scene Coordinator (OSC) Jon Gulch.

This site assessment report is organized into the following sections:

- **Section 1, Introduction** – Briefly describes the objectives of the site assessment and the site assessment report organization
- **Section 2, Site Background** – Details the Site description and history
- **Section 3, Site Assessment Activities** – Discusses methods used and activities conducted during the site assessment
- **Section 4, Analytical Results** – Discusses analytical results for samples collected during the site assessment
- **Section 5, Threats to Human Health and the Environment** – Identifies conditions at the Site that warrant a removal action under the National Oil and Hazardous Substances Pollution Contingency Plan (NCP)
- **Section 6, Summary** – Summarizes the removal site assessment findings and lists potential removal action activities and conditions that may warrant additional evaluation

2. SITE BACKGROUND

This section discusses the Site description and history.

2.1 SITE DESCRIPTION

The Site is located in an urban area at 2234 Smead Avenue in Toledo, Lucas County, Ohio (**Figure 1**). The Site coordinates are 41.6648 North latitude and 83.5747 West longitude. The Site currently is abandoned and secured, and no utilities serve the portions of the building addressed as part of the removal site assessment.

The Site consists of a single, large warehouse building where more than 5,000 steel drums are stored. **Figure 2** shows the Site features. Separate buildings are attached to the northeast and southwest sides of the Site building. The names and business types of the adjoining buildings are unknown. The Site building shows severe signs of weathering and aging, making several areas inaccessible due to safety concerns. Portions of the roof and ceiling have collapsed and currently are propped up with temporary supports or supported by stacked drums. Some portions of the roof are open to the outside, allowing rain and snow to enter. During the site assessment, standing water was present in some sections of the building. Several fallen drums have ruptured and spilled their contents onto the floor in the building.

The Site and building are surrounded on all sides by commercial and residential developed land. The closest residence is located approximately 100 feet east of the Site.

2.2 SITE HISTORY

Environmental Purification Industries (EPI) formerly used the Site building as a storage warehouse for automotive paint collected from overspray during production. Before being warehoused in the Site building, the waste paint was baked in an oven at a separate facility. A certain percentage of the used paint was recycled into new automotive paint. For unknown reasons, the company abandoned the warehouse and left the drum contents inside.

3. SITE ASSESSMENT ACTIVITIES

Site assessment activities were conducted on May 24, 2012. The OSC and three WESTON START members conducted a Site walk-through, documented and inventoried the drum

containers and general Site conditions, and sampled various open and sealed drums. On May 25, 2012, a courier delivered all samples to the designated laboratory for analysis.

The site assessment tasks were designed to document the potential for imminent and substantial threats to the public health or welfare of the United States or the environment based on guidance in the NCP, Title 40 of the *Code of Federal Regulations* (CFR), Part 300.415(b)(2). In particular, the site assessment activities focused on characterizing wastes stored in abandoned drums and identifying potential sources of soil and water contamination.

The following subsections describe the container inventory and drum sampling activities. **Appendix A** provides photographic documentation of the site assessment activities and Site conditions.

3.1 CONTAINER INVENTORY

The drum inventory at the Site was documented on handwritten log sheets during the site assessment, including container types, markings, labels, condition, and contents. As shown in **Figure 3**, the warehouse building was divided into Areas A through D to facilitate the container inventory.

The exact number of drums at the Site is unknown because certain areas of the building were inaccessible due to safety concerns and the current placement of stacked drums. Approximately 5,134 drums are estimated to be present at the Site. The drums were arranged four per pallet and stacked three pallets high throughout the building. The condition of the drums varied from poor to fair, with most showing signs of heavy weathering and rust. Several drums were leaking their contents onto the floor of the building.

The drums showed some consistent labeling. Many paper labels contained the nomenclature “EPI-MER.” with various lot numbers and EPI’s address of 2111 Champlain Street in Toledo, OH 43611. Many drum labels had been painted over and were not legible. Other painted-over labels identified “Non-Hazardous Waste,” “Hazardous Waste,” and “Flammable Liquid.” Not all labels could be read because of inaccessibility issues.

Of the approximately 5,134 drums within the building, about 50 had no lids. The rest of the accessible drums were closed and sealed. Most drums were not accessible, and their condition could not be determined. The contents in the observed open drums seemed consistent with paint in various stages of solidification. Some drums contained 3 to 6 inches of liquid atop the solidified paint, but it is unknown if the liquid is rainwater or had separated out from the paint.

3.2 DRUM SAMPLING

Drum sampling included both open and closed drums. Open drum sampling was performed in Level D personal protective equipment (PPE), including safety glasses and rubber gloves. Nine samples were collected from open drums. Attempts were made to collect both liquid and solid samples that showed color and textural differences. Six liquid samples (including duplicates) were collected using drum thieves, and six solid samples (including duplicates) were collected using rubber gloves.

The OSC and three WESTON START personnel donned Level B PPE to collect closed drum samples. Three closed, 55-gallon drums were sampled based on label information and accessibility. The closed drums were opened using a brass bung wrench, and the bung of each drum was closed after sample collection. Two of the drums contained solidified material, and no samples were collected. Closed drum D011 contained a thick gray liquid, and a sample was collected.

The table below lists the headspace photoionization detector (PID) reading and sample identification number for each sample collected.

Drum Sample PID Headspace Readings and Sample Identification Numbers

Drum ID	Description	Labeling	PID Headspace Reading (ppm)	Matrix	Sample ID No.
D001	Steel, 55-gallon	None	NA	Solid	SA-D-D001
D002	Steel, 55-gallon	None	0.4	Solid	SA-C-D002
D003	Steel, 55-gallon	None	0.6	Liquid	SA-C-D003
D004	Steel, 55-gallon	None	NA	Solid	SA-C-D004
D005	Steel, 55-gallon	None	NA	Solid	SA-C-D005
D006	Steel, 55-gallon	Emulsion	0.0	Liquid	SA-C-D006
D007	Steel, 55-gallon	None	0.2	Liquid	SA-C-D007
D008	Steel, 55-gallon	None	0.0	Solid	SA-B-D008
D009	Steel, 55-gallon	Non-Hazardous, "04 rework 7/25/98, 75%"	0.0	Liquid	SA-A-D009
D010	Steel, 55-gallon	None	8.4	Solid	None
D011	Steel, 55-gallon	None	0.0	Liquid	SA-C-D011
D012	Steel, 55-gallon	None	2.1	Solid	None

Notes:

ID = Identification

PID = Photoionization detector

ppm = Part per million

Each drum sample was transferred from the dedicated sampler into labeled, laboratory-provided sample containers. Drum samples were stored in a cooler on ice for delivery to the designated laboratory. The analyses requested for each solid sample were ignitability, corrosivity (pH), Toxicity Characteristic Leaching Procedure (TCLP) metals, TCLP volatile organic compounds (VOC), and TCLP semivolatile organic compounds (SVOC). The analyses requested for each liquid sample were flashpoint, corrosivity (pH), TCLP metals, TCLP VOCs, and TCLP SVOCs.

4. ANALYTICAL RESULTS

On May 25, 2012, all samples were delivered under chain of custody to the designated laboratory, EA Group in Mentor, Ohio. Preliminary analytical results were transmitted electronically by the laboratory and forwarded to the OSC on June 7, 2012. The final analytical report was transmitted to a WESTON START chemist on June 7, 2012, for review and validation. All laboratory results were deemed suitable for use. **Appendix B** provides the laboratory analytical data and validation report for the samples.

Flashpoint, pH, TCLP metals, TCLP VOC, and TCLP SVOC analytical results were compared to the Characteristics of Hazardous Waste in 40 CFR Part 261, Subpart C. **Table 1** summarizes the drum sample analytical results. None of the drum sample results exceeded the TCLP regulatory limits or the limits for defining characteristic hazardous waste as either ignitable or corrosive. Applicable standards for each analyte are listed in parentheses after the sample results summarized below.

SA-D-D001

Ignitability: Negative
pH: 8.5 standard units (SU) (<2.0 or >12.5 SUs)
TCLP Metals: 1.16 milligrams per liter (mg/L) barium (100 mg/L)
TCLP VOCs: Not detected
TCLP SVOCs: Not detected

SA-C-D002

Ignitability: Negative
pH: 9.2 SUs (<2.0 or >12.5 SUs)
TCLP Metals: 0.281 mg/L barium (100 mg/L)
TCLP VOCs: Not detected
TCLP SVOCs: Not detected

SA-C-D003

Flashpoint: >200 degrees Fahrenheit (<140 degrees Fahrenheit)
pH: 9 SUs (<2.0 or >12.5 SUs)
TCLP Metals: 5.24 mg/L barium (100 mg/L)
TCLP VOCs: Not detected
TCLP SVOCs: 0.053 mg/L pyridine (5 mg/L)

SA-C-D004

Ignitability: <2.2 millimeters per second (mm/sec)
pH: 8.1 SUs (<2.0 or >12.5 SUs)
TCLP Metals: 0.402 mg/L barium (100 mg/L)
TCLP VOCs: Not detected
TCLP SVOCs: Not detected

SA-C-D005

Ignitability: <2.2 mm/sec
pH: 8.9 SUs (<2.0 or >12.5 SUs)
TCLP Metals: 0.195 mg/L barium (100 mg/L)
TCLP VOCs: Not detected
TCLP SVOCs: Not detected

SA-C-D006

Flashpoint: >200 degrees Fahrenheit (<140 degrees Fahrenheit)
pH: 7.5 SUs (<2.0 or >12.5 SUs)
TCLP Metals: Not detected
TCLP VOCs: Not detected
TCLP SVOCs: Not detected

SA-C-D007

Flashpoint: >200 degrees Fahrenheit (<140 degrees Fahrenheit)
pH: 10 SUs (<2.0 or >12.5 SUs)
TCLP Metals: 0.893 mg/L barium (100 mg/L)
TCLP VOCs: Not detected
TCLP SVOCs: Not detected

SA-B-D008

Ignitability: <2.2 mm/sec
pH: 7.5 SUs (<2.0 or >12.5 SUs)
TCLP Metals: 0.796 mg/L barium (100 mg/L)
TCLP VOCs: Not detected
TCLP SVOCs: Not detected

SA-A-D009

Flashpoint: >200 degrees Fahrenheit (<140 degrees Fahrenheit)
pH: 9 SUs (<2.0 or >12.5 SUs)
TCLP Metals: 0.163 mg/L barium (100 mg/L)
TCLP VOCs: Not detected
TCLP SVOCs: Not detected

SA-C-D011

Ignitability: Negative
pH: 7.6 SUs (<2.0 or >12.5 SUs)
TCLP Metals: 0.111 mg/L barium (100 mg/L)
TCLP VOCs: Not detected
TCLP SVOCs: Not detected

5. THREATS TO HUMAN HEALTH AND THE ENVIRONMENT

Factors to be considered in determining the appropriateness of a potential removal action at a site are delineated in the NCP at 40 CFR 300.415(b)(2). A summary of the factors applicable to the Site is presented below.

- **Actual or potential exposure of nearby human populations, animals, or the food chain to hazardous substances or pollutants or contaminants**

Analytical results for drum samples collected during the site assessment indicated no wastes exceeding the TCLP regulatory limits or the limits for defining characteristic hazardous wastes as either corrosive or ignitable.

During the site assessment, an estimated 5,134 drums were warehoused in the Site building. No consistent labeling appeared on the drums, however hazardous waste labels were present on some of the inaccessible drums and had been painted or covered over. Many containers were in poor condition and exposed to the elements, and most were inaccessible for inventorying or sampling. Several fallen and punctured drums showing signs of release were observed at the Site. Approximately 50 drums were accessible for sampling, leaving over 5,000 drums at the Site with unknown contents. Due to the possibility of hazardous waste being stored in the inaccessible drums, there is a potential risk to nearby businesses and residents in the event of a release.

- **Actual or potential contamination of drinking water supplies or sensitive ecosystems**

Although no characteristic hazardous wastes were identified at the Site based on site assessment laboratory analytical results, the collapse of much of the on-site building roof allowed water to enter and accumulate in the building. Surface water runoff from the Site flows directly into storm sewers and surrounding areas. Because many drums contain unknown contents and are continually exposed to the elements, the drums will continue to deteriorate and could eventually release their contents to storm sewers, and potentially reach surface water.

- **Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released**

During the site assessment, several areas inside the Site building contained several inches of standing water from deteriorating roofs. Some drums containing unidentified wastes were located in flooded areas of the building. Infiltration of rain water and snow melt increases the likelihood of a release of potentially hazardous substances from the drums.

- **Threat of fire or explosion**

Due to the large amount of drums with unknown contents in the Site building, a fire or explosion in the building could result in a release of potentially hazardous substances at or from the Site. In addition, potentially flammable or explosive materials could be

stored in the inaccessible drums, which would increase the threat of fire or explosion within the Site building.

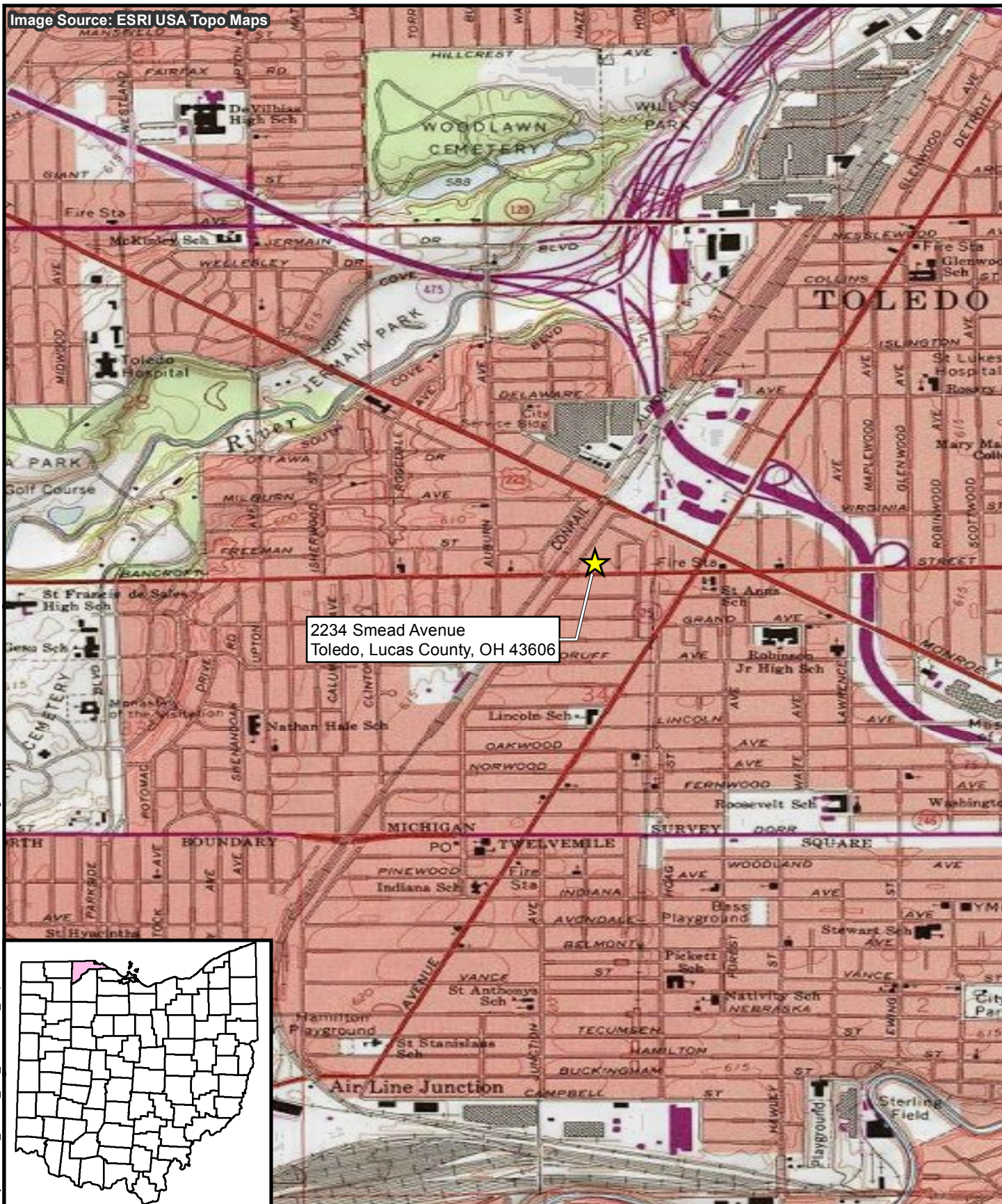
6. CONCLUSIONS

The tasks completed as part of this site assessment were designed to document the potential for imminent and substantial threats to the public health or welfare of the United States or the environment posed by uncontrolled, abandoned wastes at the Site. Based on an inspection of the Site, drum container inventory, and sampling results, the conclusions summarized below can be drawn. Further evaluation beyond the scope of this site assessment may be needed in some cases to determine the current status or actual threats of release.

- An on-site drum inventory estimates 5,134 drums warehoused in the Site building. This estimate is only an approximation. Many areas of the building were inaccessible due to safety concerns resulting from the structural dilapidation of the building and the placement of stacked drums.
- Drum sampling was limited to approximately 50 accessible drums. The analytical results show that the sampled drums contain no characteristic hazardous wastes. Based on information regarding past operations at the Site, it is believed that the inaccessible drums contain similar contents as the sampled drums. However, the inaccessible drums may contain other potentially hazardous contents.
- The threat of structural collapse of the roof, water infiltration, and fire within the building pose potential future environmental risks.

FIGURES

Image Source: ESRI USA Topo Maps



Legend



Site Location

0 2,000 Feet



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Figure 1
Site Location Map
Smead Avenue Drum Site
Toledo, Lucas County, Ohio

Imagery Source: ESRI World Imagery
Parcel Data Source: Lucas County Engineer's Office
(<http://www.co.lucas.oh.us/index.aspx?NID=1316>)



Legend

- Site Boundary
- Road Centerlines
- Parcels
- Railroads

0 150
Feet



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Figure 2
Site Features Map
Smead Avenue Drum Site
Toledo, Lucas County, Ohio

Imagery Source: ESRI World Imagery

Loading Dock

A

B

D

C

Legend

- Area A
- Area B
- Building Outline

- Area C
- Area D

0 40 Feet



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Figure 3

Inventory and Sampling Areas
Smead Avenue Drum Site
Toledo, Lucas County, Ohio

TABLES

APPENDIX A
PHOTOGRAPHIC DOCUMENTATION



Site: Smead Avenue Drum Site

Photograph No.: 1

Date: 5/23/12

Direction: South

Photographer: Ryan Green

Subject: Loading docks to Site building at north end of the Site



Site: Smead Avenue Drum Site

Photograph No.: 2

Date: 5/23/12

Direction: Southeast

Photographer: Ryan Green

Subject: Area A containing numerous stacked drums along southeast wall



Site: Smead Avenue Drum Site

Photograph No.: 3

Direction: Southeast

Subject: EPI label on drum in Area A

Date: 5/23/12

Photographer: Ryan Green



Site: Smead Avenue Drum Site

Photograph No.: 4

Direction: Southwest

Subject: Partially collapsed ceiling over stacked drums in Area B

Date: 5/23/12

Photographer: Ryan Green



Site: Smead Avenue Drum Site

Photograph No.: 5

Direction: Southwest

Subject: Haphazardly stacked drums in Area B

Date: 5/23/12

Photographer: Ryan Green



Site: Smead Avenue Drum Site

Photograph No.: 6

Direction: Northwest

Subject: Fallen drums with contents spilled onto floor in Area B

Date: 5/23/12

Photographer: Ryan Green



Site: Smead Avenue Drum Site

Photograph No.: 7

Direction: West

Subject: Haphazardly stacked drums in Area B

Date: 5/23/12

Photographer: Ryan Green



Site: Smead Avenue Drum Site

Photograph No.: 8

Direction: Southwest

Subject: Area C showing numerous stacked drums

Date: 5/23/12

Photographer: Ryan Green



Site: Smead Avenue Drum Site

Photograph No.: 9

Date: 5/23/12

Direction: Southeast

Photographer: Ryan Green

Subject: Partially collapsed roof over stacked drums in Area C; drums are supporting the weight of the roof

APPENDIX B
LABORATORY ANALYTICAL DATA AND VALIDATION REPORT

Table 1
Drum Sample Analytical Results
Smead Avenue Drum Site
Toledo, Lucas County, Ohio

Parameter	Analytical Method	Unit	Regulatory Limit	Sample ID No.											
				SA-D-D001	SA-C-D002	SA-C-D002 (Dup)	SA-C-D003	SA-C-D004	SA-C-D005	SA-C-D006	SA-C-D006 (Dup)	SA-C-D007	SA-B-D008	SA-A-D009	SA-C-D011
				Solid	Solid	Solid	Liquid	Solid	Solid	Liquid	Liquid	Liquid	Solid	Liquid	Liquid
Characteristic															
Ignitability	SW846-1030M	mm/sec	NA	Negative	Negative	Negative	NA	<2.2	<2.2	NA	NA	NA	<2.2	NA	Negative
Flashpoint	SW846-1010	°F	>140	NA	NA	NA	>200	NA	NA	>200	>200	>200	NA	>200	NA
Corrosivity (pH)	SW846-9040B	pH SUs	2-12.5	8.5	9.2	9	9	8.1	8.9	7.5	7.5	10	7.5	9	7.6
TCLP Metals															
Arsenic	SW846-6010B	mg/L	5.0	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.50	<0.50	<0.10	<0.10	<0.10	<0.10
Barium	SW846-6010B	mg/L	100.0	1.16	0.281	0.299	5.24	0.402	0.195	<0.50	<0.50	0.893	0.796	0.163	0.111
Cadmium	SW846-6010B	mg/L	1.0	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.50	<0.50	<0.10	<0.10	<0.10	<0.10
Chromium	SW846-6010B	mg/L	5.0	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.50	<0.50	<0.10	<0.10	<0.10	<0.10
Lead	SW846-6010B	mg/L	5.0	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.50	<0.50	<0.10	<0.10	<0.10	<0.10
Mercury	SW846-7470A	mg/L	0.2	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
Selenium	SW846-6010B	mg/L	1.0	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.50	<0.50	<0.10	<0.10	<0.10	<0.10
Silver	SW846-6010B	mg/L	5.0	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.50	<0.50	<0.10	<0.10	<0.10	<0.10
TCLP VOCs															
Benzene	SW846-8260B	mg/L	0.5	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<100	<100	<0.12	<0.10	<1.0	<0.10
Carbon tetrachloride	SW846-8260B	mg/L	0.5	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<100	<100	<0.12	<0.10	<1.0	<0.10
Chlorobenzene	SW846-8260B	mg/L	100.0	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<100	<100	<0.12	<0.10	<1.0	<0.10
Chloroform	SW846-8260B	mg/L	6.0	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<100	<100	<0.12	<0.10	<1.0	<0.10
1,2-Dichloroethane	SW846-8260B	mg/L	0.5	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<100	<100	<0.12	<0.10	<1.0	<0.10
1,1-Dichloroethene	SW846-8260B	mg/L	0.7	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<100	<100	<0.12	<0.10	<1.0	<0.10
Methyl ethyl ketone (2-butanone)	SW846-8260B	mg/L	200.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1000	<1000	<1.2	<1.0	<10	<1.0
Tetrachloroethylene	SW846-8260B	mg/L	0.7	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<100	<100	<0.12	<0.10	<1.0	<0.10
Trichloroethylene	SW846-8260B	mg/L	0.5	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<100	<100	<0.12	<0.10	<1.0	<0.10
Vinyl chloride	SW846-8260B	mg/L	0.2	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<100	<100	<0.12	<0.10	<1.0	<0.10
TCLP SVOCs															
1,4 Dichlorobenzene	SW846-8270C	mg/L	7.5	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<5.5	<3.5	<0.050	<0.050	<0.30	<0.15
2,4-Dinitrotoluene	SW846-8270C	mg/L	0.1	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<5.5	<3.5	<0.050	<0.050	<0.30	<0.15
Hexachlorobenzene	SW846-8270C	mg/L	0.1	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<5.5	<3.5	<0.050	<0.050	<0.30	<0.15
Hexachlorobutadiene	SW846-8270C	mg/L	0.5	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<5.5	<3.5	<0.050	<0.050	<0.30	<0.15
Hexachloroethane	SW846-8270C	mg/L	3.0	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<5.5	<3.5	<0.050	<0.050	<0.30	<0.15
Nitrobenzene	SW846-8270C	mg/L	2.0	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<5.5	<3.5	<0.050	<0.050	<0.30	<0.15
Pentachlorophenol	SW846-8270C	mg/L	100.0	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<28	<18	<0.25	<0.25	<1.5	<0.75
Pyridine	SW846-8270C	mg/L	5.0	<0.050	<0.050	<0.050	0.053	<0.050	<0.050	<5.5	<3.5	<0.050	<0.050	<0.30	<0.15
2,4,5-Trichlorophenol	SW846-8270C	mg/L	400.0	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<5.5	<3.5	<0.050	<0.050	<0.30	<0.15
2,4,6-Trichlorophenol	SW846-8270C	mg/L	2.0	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<5.5	<3.5	<0.050	<0.050	<0.30	<0.15

Notes:

Bold results were detected above the laboratory reporting limits.

°F = Degree Fahrenheit

ID = Identification

mg/L = Milligram per liter

mm/sec = Millimeter per second

NA = Not applicable

SU = Standard unit

SVOC = Semivolatile organic compound

TCLP = Toxicity Characteristic Leaching Procedure

VOC = Volatile organic compound